

3501 23rd Avenue • Council Bluffs, IA 51501
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240869

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DOCKET NUMBER: FMCSA-2002-12334 -39

1. Please indicate your primary occupation(s) from the following list:

- | | |
|-------------------------------------------------------------------------|---------------------------------------------------------------------|
| <input type="checkbox"/> Truck Driver | <input checked="" type="checkbox"/> Owner-Operator |
| <input type="checkbox"/> Motor Coach / Bus Driver | <input checked="" type="checkbox"/> Fleet Manager / Owner |
| <input type="checkbox"/> Company Safety Director | <input type="checkbox"/> Transit System Administrator |
| <input type="checkbox"/> Commercial Driver Trainer | <input type="checkbox"/> Motor Carrier Insurance Provider |
| <input type="checkbox"/> Risk Assessment Specialist | <input type="checkbox"/> Labor Union Representative |
| <input type="checkbox"/> Motor Vehicle Admin. (State Driver's Licenses) | <input type="checkbox"/> Enforcement Officer (motor carrier safety) |
| <input type="checkbox"/> Public Interest Group | <input type="checkbox"/> Other |

2. Do you think a graduated commercial driver's license (GCDL) is needed?

- ☒ Yes ☐ No

3. Should issuance of a GCDL be linked to enrollment in a commercial driving training program?

- ☐ Yes ☒ No

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Should the curricula of a commercial driver training program meet widely-
established standards for a student to be eligible to receive a GCDL while in
training?

N/A

5. Approximately how many months/years of entry level training and
experience should new drivers receive before "graduating" to an unrestricted
CDL?

3 months

6. Should an applicant's past driving record be considered in issuing a GCDL?



Yes



No

7. How many of each of the following types of motor vehicle accidents and
convictions within the past 12 months should cause an application to be denied
a GCDL?



Passenger car or light truck motor
vehicle accidents



Other convictions for motor vehicle
traffic control violations



DUI/DWI convictions



Controlled substances convictions



Reckless driving convictions



Traffic violations and citations

8. Should penalties for drivers holding a GCDL, who have at-fault accidents or
moving violations, be more severe than those for drivers with an unrestricted
CDL?

N/A

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How many years of passenger car or light truck driving experience
 does applicant have before being issued a GCDL?

6 months

10. Which of the following restrictions should apply to entry level drivers
 operating under a GCDL?

- | | |
|--------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> Reduced hours of service | <input type="checkbox"/> Other |
| <input checked="" type="checkbox"/> Limitations on equipment type (e.g.,
doubles/triples, tank vehicles, motor
coaches, etc.) | <input checked="" type="checkbox"/> Limitations on types of cargo (e.g.,
hazardous materials, livestock, liquids,
etc.) |
| <input type="checkbox"/> Limitations on weather and visibility
conditions (e.g., ice, snow, fog, night
driving) | <input type="checkbox"/> Limitations on geography or terrain
features (e.g., mountains) |
| <input checked="" type="checkbox"/> Limitations on distance or types of highways (e.g., miles per day, interstate
highways, etc.) | |

11. Should a fully licensed CDL driver be required to accompany and observe a
 driver with a GCDL? If yes, for how many weeks/months/years?

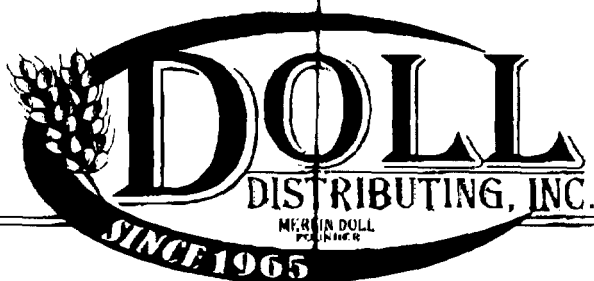
☐ Yes ☒ No

12. What is the minimum age at which an applicant should be eligible to
 receive a graduated CDL?

18

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13. Assuming that training requirements are met, what is the minimum age at which the holder of a graduated CDL should be eligible to graduate to an unrestricted CDL?

18

14. How much testing (knowledge and road test) should be given to GCDL holders prior to issuing an unrestricted CDL?

- ☒ Single test to "graduate" to an unrestricted CDL
- ☐ Periodically while holding a GCDL until training is complete
- ☐ Initial test plus re-test at 1 year after receiving Initial GCDL
- ☐ Other

15. What other factors do you feel must be addressed in the implementation of a graduated CDL program?

To benefit my small business and alleviate the shortage of OIL drivers faced by beer wholesalers and the small business community at large, drivers need not necessarily ever graduate to a full, unrestricted OIL. If OILs are restricted by age of driver, weight of vehicle, length of vehicle, terrain, distance driven, conditions, time of day and other factors, drivers may not need to ever graduate to a full and unrestricted OIL to be of maximum benefit to a beer wholesaler or other small business engaged in local delivery. I urge the DOT to consider implementing a system of graduated licensing in which each level of the GCDL can be considered a OIL in its entirety and need not necessarily be considered only a stepping-stone to the unrestricted OIL.

16. What costs would you or your organization anticipate incurring if a GCDL program is implemented?

A GCDL could actually result in cost savings for beer wholesalers and small business, in general. Beer wholesalers bear the financial burden of training OIL drivers, and are happy to do so. However, when recently certified OIL drivers are "cherry picked" from my company to become long haul, over the road drivers, I am left to begin the process all over again at a significant expense. If my business could employ a driver who had mastered a set of skills that allowed him to safely operate a commercial vehicle for delivering our product, without a full, unrestricted OIL, that would result in a cost savings for my business. These savings could then be used for greater job creation, warehouse improvement, greater retail execution and a host of other pro-growth economic initiatives.

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